

SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with Local Rule 9014-1(b).

Exhibit 1	Proposed Form of Order
Exhibit 2	Intentionally Omitted (<i>Ex Parte</i> Motion to be File Concurrently)
Exhibit 3	Intentionally Omitted (No Brief Required)
Exhibit 4	Certificate of Service
Exhibit 5	Intentionally Omitted
Exhibit 6	Documentary Exhibits
Exhibit A	10/2/13 Correspondence from T. Ciantra to B. Bennett
Exhibit B	10/7/13 Correspondence from G. Irwin to T. Ciantra
Exhibit C	10/7/13 Correspondence from G. Irwin to T. Ciantra
Exhibit D	10/15/13 Email from G. Irwin re City of Detroit
Exhibit E	Excerpts of Governor R. Snyder 10/9/13 Deposition

Exhibit 1

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

----- X	
In re:	: Chapter 9
	: :
CITY OF DETROIT, MICHIGAN,	: Case No.: 13-53846
	: :
Debtor.	: Hon. Steven W. Rhodes
----- X	

**ORDER ON INTERNATIONAL UNION, UAW’S MOTION (A) TO
COMPEL PRODUCTION OF DOCUMENTS WITHHELD ON GROUNDS
OF PRIVILEGE AND (B) FOR RECONSIDERATION OF
THIS COURT’S SEPTEMBER 19 ORDER ON PRIVILEGE ISSUES**

This matter coming before the Court on the motion (the “Motion”) of the International Union, UAW’s Motion (A) To Compel Production of Documents Withheld on Grounds of Privilege and (B) For Reconsideration of This Court’s September 19 Order on Privilege Issues, and the Court having considered UAW’s Motion, and any responses thereto; and good cause appearing;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The City is ordered to produce any documents reflecting communications with restructuring counsel withheld on the grounds of attorney-client privilege or under the work product doctrine which documents ante-date March 11, 2013 when the City retained restructuring counsel;

3. The Court's September 19 Order on the UAW Motion to Compel is vacated and the City is ordered to produce documents withheld on the grounds of common interest privilege that reflect communications between the Emergency Manager (or his staff) and representatives of the State of Michigan which ante-date July 19, 2013.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Signed on _____

Hon. Steven W. Rhodes
United States Bankruptcy Judge

Exhibit 2

Intentionally Omitted

Exhibit 3

Intentionally Omitted

Exhibit 4

-----X	
	:
In re:	:
	:
	:
	:
CITY OF DETROIT, MICHIGAN,	:
	:
	:
Debtor.	:
-----X	

I hereby certify that on this the 17th day of October 2013, I caused the *International Union, UAW Motion to (A) Compel Production of Documents Withheld on Grounds of Privilege and (B) For Reconsideration of This Court's September 19 order on Privilege Issues* to be filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Cohen, Weiss and Simon LLP

Attorneys for International Union, UAW

Exhibit 5

Intentionally Omitted